May 6, 1987

Mr. Harry Needleman, General Counsel
Cantor, Fitzgerald Securities Corp.
One World Trade Center, 105th Floor
New York, New York 10048

Dear Mr. Needleman:

The following is in response to your request as to whether asbestos was contained in the materials used to fireproof the structural steel members of the 32nd floor of One World Trade Center.

During the early stages of construction of the North Tower of the World Trade Center, the use of asbestos fireproofing materials was halted and asbestos free materials were substituted except in specific areas such as elevator shafts where, because of the velocity of the elevator cars, it was necessary to continue with the use of asbestos fireproofing since there was no available substitute at that time. In this situation the material was encased in a concrete-like mixture which was self-encapsulating and thereby prevented the escape of asbestos fibers into the air.

Extensive sampling and testing has been performed of the materials used to fireproof the structural steel and decking on the 32nd floor of One World Trade Center. All sampling of fireproofing material was conducted in accordance with procedures outlined in the United States Environmental Protection Agency (U.S.E.P.A.) publication, "Guidance for Controlling Asbestos containing Material in Buildings". The testing of these samples was conducted at the laboratory of the Port Authority Public Safety Department which is a participant in the U.S.E.P.A. Bulk Asbestos Sample Quality Assurance Program.

The results of the tests, in accordance with applicable guidelines, are as follows:

	Total Samples	Number of Samples Positive for Asbestos Containing Materials	% of Asbestos in Each Positive Sample
32nd Floor (Cols. 331-443)	24	0	0
(Cols. 310-331)	34	12*	1-40%

* Initial sampling indicated possible asbestos presence in five locations. Supplementary sampling adjacent to each of such locations resulted in three positive readings verifying asbestos presence only in three locations.

PLAINTIFF'S EXHIBIT PX-704.6

Please be advised that all Port Authority plans and specifications for the removal of asbestos on floors in the World Trade Center are in accordance with Occupational Safety and Health Administration regulations, Environmental Protection Agency guidelines, and New York City local law requirements.

In the event that the contiguous space on the 32nd floor becomes available, the Port Authority will remove the small, isolated pockets of asbestos-containing material prior to your occupancy. This removal procedure will be performed in accordance with the aforementioned regulations.

Port Authority staff is available to review with you and your representatives the sampling and testing that was employed, the methodology used to analyze the test results, the detailed results of the tests of each sample and the location on the floor from which each sample was obtained.

Sincerely,

Dominick Montalbano
Assistant Director for
Physical Facilities
World Trade & Economic Development

bcc: F. Boyce, T. Donovan, H. Henschel, R. Linn, T. Lynch, S. Samperi